

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

IN RE: VOLKSWAGEN "CLEAN DIESEL"
CASES

Case No. 1:15-cv-1218 (LO)

NOTICE OF SELECTION OF PLAINTIFFS' INTERIM CO-LEAD COUNSEL

Pursuant to the instructions that I received from the Court during the hearing held on October 23, 2015, and after having solicited, received, and reviewed a large number of applications to serve as interim co-lead counsel, I have selected the following three attorneys and firms to serve as my interim co-lead counsel:

1. Steven J. Toll
Cohen Milstein Sellers & Toll PLLC
1100 New York Ave., NW, Suite 500
Washington, DC 20005
2. Joseph H. Meltzer
Kessler Topaz Meltzer & Check, LLP
280 King of Prussia Road
Radnor, PA 19087
3. David H. Thompson
Cooper & Kirk, PLLC
1523 New Hampshire Ave., N.W.
Washington, D.C. 20036

I believe these attorneys and their respective firms are amply qualified to perform the duties of interim co-lead counsel.

Cohen Milstein has extensive experience in high profile class actions as lead counsel. Steve Toll is the managing partner and is currently co-lead counsel in the Lumber Liquidators litigation pending in this Court before Judge Trenga.

Kessler Topaz has extensive experience litigating complex class actions alleging corporate fraud and other malfeasance. With nearly one hundred attorneys dedicated exclusively to complex litigation on behalf of plaintiffs, the firm has substantial resources and has built its reputation on the ability to successfully litigate and resolve large, complex actions.

Cooper & Kirk brings significant experience litigating complex civil and commercial matters. In particular, the firm has significant experience both with litigating common law claims raised against the background of complex federal regulatory schemes and with managing discovery involving complex financial, technical, and engineering data. The firm also has experience litigating matters that are the subject of ongoing congressional investigations.

I believe that these three firms have the expertise needed to assist in conducting this matter while the motion for consolidation is pending before the Judicial Panel on Multidistrict Litigation. Were this matter ultimately consolidated and transferred to the Eastern District of Virginia, I would consider recommending to the Court the appointment of additional counsel to assist in this massive litigation, including in the nature of a Plaintiffs' Steering Committee Discovery Committee, or other types of Committees.

I have attached a proposed order appointing interim co-lead counsel for the Court's consideration.

Dated: October 29, 2015

Respectfully Submitted,

/s/ William D. Dolan, III
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CERTIFICATE OF SERVICE

I hereby certify that on this the 29th day of October, 2015, a true and correct copy of the foregoing Notice of Selection of Plaintiffs' Interim Co-Lead Counsel was served by this Court's ECF system and electronic mail upon counsel who have electronically noticed their appearance in all of the consolidated cases.

/s/ William D. Dolan, III

Counsel